



CANTON DROP FORGE



February 20, 2013

BY FEDERAL EXPRESS
U.S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, IL 60604-3507

Attention: Mr. Brian Kennedy

Reference: Canton Drop Forge, Inc., 4575 Southway Street Southwest, Canton, OH
EPA ID #OHD004465142; Compliance Evaluation Inspection
Project No. 196663.0006

Dear Mr. Kennedy:

TRC Environmental Corp. (TRC) was engaged by Canton Drop Forge in 2012 to assist the Company with environmental compliance and participation in the Ohio Voluntary Action Program. This letter is in response to your January 22, 2013 correspondence regarding the USEPA inspection performed on August 6-8, 2012, at the Canton Drop Forge (CDF) facility in Canton, Ohio. The January 22 letter requests that CDF "submit a letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements." Therefore, without admission of liability, the Company provides this letter to fulfill the requested documentation. In order to address items 2 and 3 of the Notice of Violation (NOV) this response describes: a) the cause of the releases of oil; b) measures that have been taken to remove the oil from the ponds; c) measures that have and will be taken to prevent future releases; and d) measures that have and will be taken to clean-up and properly manage the released oil.

1. NOV Item 1: Under the Used Oil Management Standards, containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil," See OAC 3745-279-22(C)(1) [40 CFR § 279.22(c)(1)].

At the time of inspection, a tank collecting used oil from the Pond 2 rope skimmer and a tank acting as an oil/water separator south of Forge Shop Building C were not labeled or marked with the words "Used Oil." CDF, therefore, violated the aforementioned requirement of the Used Oil Management Standards.

During the inspection, however, CDF labeled or marked both tanks with the words "Used Oil." Thus, no further action is necessary to comply with this requirement at this time for these tanks.

Response: CDF is implementing measures to ensure proper labeling continues to be performed in accordance with applicable regulations.

2. **NOV Item 2:** Under the Used Oil Management Standards, used oil generators are prohibited from storing used oil in a surface impoundment, unless such unit is subject to OAC 3745-54 to 3745-57 and 3745-205 [40 CFR § 264 Subpart A-N and DD] or Chapters 3745-65 to 3745-69 and 3745-256 [40 CFR § 265 Subparts A-N and DD], and OAC 3745-270. See OAC 3745-279-22(A) [40 CFR § 279.22(a)].

Similarly, the Used Oil Management Standards prohibit managing used oil in a surface impoundment, unless such unit is subject to OAC 3745-54 to 3745-57 and 3745-205 [40 CFR § 264 Subpart A-N and DD] or OAC 3745-65 to 3745-69 and 3745-256 [40 CFR § 265 Subparts A-N and DD], and Chapter 3745-270. See OAC 3745-279-22(A) [40 CFR § 279.22(a)]. See OAC 3745-279-12(A) [40 CFR § 279.12(a)].

In other words, a used oil generator is prohibited from storing or managing used oil in a surface impoundment, unless inter alia, it is operating under a hazardous waste permit or is under interim status.

CDF manages and stores used oil in two surface impoundments, designated Ponds 1 and 2. CDF operates an oil/water separator south of Forge Shop Building C that receives wastewater containing used oil generated by the facility's forging operations. The separator removes and collects a portion of the used oil for offsite shipment. CDF then conveys the wastewater from the separator to Pond 2 and, during overflows, to Pond 1. At the time of inspection, both ponds 1 and 2 contained layers of used oil floating on their surfaces and had used oil along their banks.

At the time of inspection, neither Pond 1 nor Pond 2 was operating under a hazardous waste permit or under interim status. CDF, therefore, is in violation of the aforementioned requirements of the Used Oil Management Standards by storing and managing used oil in the surface impoundments designated Pond 1 and 2.

Response: The following paragraphs outline the cause of the oil releases to the ponds and measures taken to contain, clean-up, and prevent future releases.

A. Source of Oil in Pond #1 and Pond #2

The existing oil-water separator located at the South end of the Forge Shop Building C was originally equipped with coalescing mesh filters to maximize the oil-water separation process in a compact separator footprint. However, due to the significant amount of grit in the oil and process water discharged to this unit, the filter plugged which restricted the overall flow through the unit; subsequently the filter was

removed. With the filter removed, the efficiency and effectiveness of the oil separation process within this compact separator unit is less than design and is further limited during high hydraulic loading conditions such as significant storm events. As a result of this inefficient separation at the unit, oil that was not separated from the water flowed into Ponds #1 and #2.

B. Measures to Remove the Oil from the Ponds

In 2012, CDF contracted with Complete Waste Disposal to remove oil from Pond #1. Complete Waste Disposal staged a fractionalization tank with a large pump and skimmer assembly to remove oil (and associated water) from the pond surface. Non-hazardous waste manifest documents indicate the dates and gallons of the oil-water mixture (summarized below) shipped off- site for recycling.

Oil from Pond #1	
Date	(gallons)
8/3/12	5,800
9/12/12	6,500
9/13/12	6,500
9/14/12	6,500
9/14/12	6,000
9/17/12	6,000
9/18/12	6,000
9/20/12	6,000

The total amount of oil-water mixture removed from Pond #1 was 49,300 gallons. After removal of this substantial volume, removal activities were suspended once the thickness of the oil became insufficient for effective skimming. The oil was recycled by Environmental Specialists, Inc. in Youngstown, Ohio. The removal of oil from Pond #2 will occur in a similar fashion prior to the clean-up operations detailed below in paragraph D.

C. Measures to Prevent Future Oil Releases

Since the USEPA site inspection in August 2012, substantial efforts have been performed to determine current site conditions and to define a remedy to improve oil-water separation and oil reclamation in order to prevent oil from reaching any of the on-site ponds. This included the Company engaging TRC to perform an engineering study for process and storm water improvements and to develop storm water best management practices. Efforts are underway to implement the following:

- Remove existing grit chamber and oil-water separator (OWS) and replace with an OWS equipped with coalescing-plate technology to maximize oil and solids separation while minimizing the potential for clogging as observed with coalescing mesh. This oil-water separator will be equipped with an integral oil pump and an oil storage tank within an appropriately-sized secondary containment structure. Water will discharge through a new dedicated below-grade

force main to Pond #2. Discharge pumps will be connected to an emergency backup power supply to provide uninterruptable power in order to eliminate potential oil bypass and overflow. The engineering design for this system was initiated by TRC September 2012. Procurement and installation of the redesigned OWS is expected to be completed in 2013.

- Storm Water Best-Management Practices (BMPs)
 - Direct existing Pond #1 storm water to two OWS units (to be installed) equipped with coalescing-plate technology and integral oil storage.
 - Direct existing Pond #2 storm water to one OWS unit (to be installed) equipped with coalescing-plate technology and integral oil storage.
 - Periodic OWS inspections and preventative maintenance to remove captured oil and sediments.
 - Contingency planning and equipment to facilitate oil recovery in the event of an upset condition, such as installation of floating containment booms at OWS outfalls within Pond #1 and Pond #2.
 - Installation of secondary containment structures at strategic locations at the facility for storage of bulk oil containers.

D. Measures to Clean-up Released Oil

In September 2012, CDF entered the RCRA and Voluntary Action Program Memorandum of Agreement Track (RCRA and VAP MOA Track). A copy of CDF's documentation of entry into the Ohio Voluntary Action Program (VAP) is enclosed. TRC's Ohio Certified Professional, Donald Fay, is serving as the VAP project manager. TRC Environmental Corporation (TRC) subsequently completed a *Draft* VAP Phase I Property Assessment (PA) and a *Draft* VAP Phase II PA in November 2012 which included the collection of soil, ground water, sediment, and surface water samples in accordance with the RCRA and VAP MOA Track. Supplemental site investigation (i.e., field efforts occurring late January 2013) was performed to further characterize the site and support remedial design alternatives. The VAP reports will remain *Draft* until they are submitted as part of the VAP No Further Action Letter submittal, and will be posted in the public repository that is required as part of the MOA Track. Based upon the *Draft* VAP Phase II and risk assessment, a Remedial Action Plan (RAP) is being developed for submittal for 30-day public comment and subsequent Ohio EPA approval, which is expected this summer (2013). The RAP will demonstrate that applicable standards will be achieved following implementation of the remedy. It is CDF's intent to remediate Pond #1 and Pond #2 by removing residual oil and oil-saturated soils. This remediation will be conducted in conjunction with the oil/water separation improvement installations as described above in paragraph C to prevent oil from reaching Ponds #1 and #2 in the future.

Based on the *Draft* Phase II sampling results, the sediments, impacted surrounding soil, and residual oil in Ponds #1 and #2 will need to be remediated. The initial *Draft* Phase II sampling indicated that the only constituents of concern (COCs) requiring remediation are petroleum compounds. The initial *Draft* Phase II sampling also indicated that the material to be removed will be considered RCRA non-hazardous. Once the RAP is approved by Ohio EPA, the oil and oily water will be removed from Ponds #1 and #2 and these

ponds will be de-watered. Subsequently, soil/sediments that exhibit visual evidence of potential impacts (i.e., staining) will be removed from around the edges and bottom of Ponds #1 and #2.

Once Ponds #1 and #2 have been remediated, confirmatory sampling will be conducted to document that applicable standards have been achieved. Upon receipt of acceptable results, the bottoms and sidewalls of the Pond #1 and Pond #2 excavations will be backfilled with low permeability material to prevent any residual soil impacts from impacting future pond water. Ponds #1 and #2 are anticipated to be used in the future for retention of treated process water and storm water.

Implementation of the VAP remedy is dependent on public comment and regulatory approval. Design and preliminary work is progressing and the implementation of the remedy is anticipated to be initiated in the summer or fall of 2013.

3. NOV Item 3: A person who generates a waste must determine if that waste constitutes a hazardous waste. See OAC 3745-52-11 [40 CFR § 262.11]. The definition of “waste” includes, inter alia, any material that is accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated. See OAC 3645-51-02(B)(3) [40 CFR § 261.2(b)(3)].

CDF generates waste on the bottom and sides of Ponds 1 and 2, resulting from the storage and management of used oil/wastewater in Ponds 1 and 2, by the mechanisms of precipitation, adsorption, accumulation, and/or concentration.

At the time of the inspection, CDF had not determined whether the waste on the bottom and sides of Pond 1 and 2 constituted hazardous waste. CDF, therefore, violated the above-mentioned hazardous waste determination requirement.

Response: Review of historical information indicates that the material identified on the bottoms and sides of Ponds #1 and #2 is not a RCRA hazardous waste. Specifically, in 1995 Hammontree & Associates, Limited sampled the sludge lining at Pond #2 to determine proper handling and disposal¹. Sludge samples were submitted for Toxicity Characteristic Leaching Procedure (TCLP) VOCs, TCLP SVOCs, TCLP PCBs, TCLP metals, reactive cyanide, reactive sulfur, flash point, pH, paint filter, PCBs and TPH. Samples submitted for waste characterization were determined to be RCRA non-hazardous. Additionally, in 1997 sludge from Pond #1 was excavated and treated at a biocell under the direction of Parsons Engineering Science². The sludge was also determined to be RCRA non-hazardous prior to and after the biocell treatment.

¹ Hammontree 1995. *Lagoon #2 Sludge Disposal/Treatment Options*. Hammontree & Associates, Limited, March 1, 1995 (see *Draft VAP Phase I Property Assessment*).

² Parsons 1997. *Summary Report of the Results of Environmental and Geotechnical Sampling, Analyses, and Treatability Testing of Lagoon No. 2 Depositional Material at Canton Drop Forge, Inc.* Parsons Engineering Science, Inc. September 8, 1997 (see *Draft VAP Phase I Property Assessment*).

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Furthermore, as noted above in the response to NOV Item 2, CDF has initiated a number of steps to address Ponds #1 and #2. This includes site characterization and development of a RAP in accordance with the RCRA and VAP MOA Track. As part of this process, representative samples of sediment on the bottoms and sides of Ponds #1 and #2 were sampled for hazardous waste constituents (see attached Table 1). None of the samples demonstrate hazardous waste characteristics.

Summary

CDF has been proactive in responding to the inspection and is in the process of taking measures to prevent future oil releases to the ponds as well as to clean-up earlier releases. Actions taken include determining the source and pathways of oil impacting the ponds, taking immediate steps to contain any potential release, identifying and implementing measures to prevent future impact to the ponds, and implementing clean-up and proper management of impacted environmental media and other materials.

We trust this correspondence adequately describes the Company's response to the conditions identified in your January 22, 2013 letter. Please do not hesitate to contact me at (330) 477-4511 if you have questions or need additional information.

Canton Drop Forge, Inc.



Brad Ahbe
President

TRC Environmental Corporation



Donald A. Fay, Ohio VAP C.P. # 254
Vice President

Attachments

cc: Sean Denman – Canton Drop Forge
Natalie Oryshkewych – Ohio EPA Northeast District Office (w/encl.)
Kevin Palombo – Ohio EPA Northeast District Office (w/encl.)
Sue Watkins – Ohio EPA Central Office (w/encl.)

ATTACHMENT 1

Ohio EPA Acknowledgement of Entry into the Voluntary Action Program Memorandum of Agreement Track Program (MOA-Track)



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

September 24, 2012

Mr. Donald A. Fay
TRC Environmental Corporation
1382 West Ninth Street, Suite 200
Cleveland, Ohio 44113

And

Mr. Sean Denman
Canton Drop Forge, Inc.
4575 Southway Street, SW
Canton, Ohio 44707

Re: Ohio EPA's Acknowledgement of Entry into the Voluntary Action Program (VAP) Memorandum of Agreement Track (MOA-Track) Program for the Canton Drop Forge Southway Property, Project No. 276-000130-002

Dear Mr. Fay and Mr. Denman:

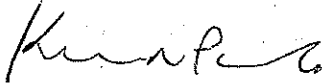
On September 5, 2012, Ohio EPA's Northeast District Office (NEDO) received your "Notice of Entry into the VAP MOA Track" for the property located at 4575 Southway Street SW, Canton, Stark County Ohio (the "Property"). Mr. Donald A. Fay submitted the document on behalf of Mr. Sean Denman (the "Volunteer"), along with proof that a document repository was set up following the VAP MOA Track "Document Repository Guidance." In addition, proof was submitted that an appropriate public notice announcing entry into the VAP MOA Track for the Property was published.

This letter is to serve as confirmation that a properly completed Notice of Entry into the VAP MOA Track has been received and that an appropriate document repository has been developed and public notice published. The voluntary action at the Property may proceed following Ohio EPA's VAP MOA Track "Procedures for Participation."

MR. DONALD A. FAY
TRC ENVIRONMENTAL CORPORATION
SEPTEMBER 24, 2012
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If you have any questions or concerns related to this review or would like to schedule a meeting or conference call, please free feel to contact me at (330) 963-1292.

Sincerely,



Kevin M. Palombo
Project Coordinator
Division of Environmental Response and Revitalization

KMP/kss

cc: Kathleen Teuscher, Risk Assessor/Project Manager, TRC Environmental

ec: Nancy Zikmanis, Supervisor, Ohio EPA, NEDO, DERR
Tiffani Kavalec, VAP Manager, Ohio EPA, CO, DERR/ACRE
Frank Robertson, Supervisor, Ohio EPA, CO, DERR/ACRE
Emily Patchen, Ohio EPA, CO, DERR/ACRE
Jackie Barr, Administrative Supervisor, Ohio EPA, CO, DERR
Ohio EPA, VAP File, CO, DERR at: records@epa.state.oh.us

ATTACHMENT 2

TABLE 1: Waste Characterization Data Summary



TABLE 1: Sediment Waste Characterization Data Summary

Analytical Group	Chemical	Regulatory Limit	IA06-SS03/0_0-0_5 02/05/2013	IA06-SS07/W/0_0-1_0 02/05/2013	IA07-SS03/W/0_0-1_0 02/06/2013	IA07-SS07/0_0-1_5 02/04/2013
GENERAL CHEM	CORROSIVITY BY PH SU	pH<2 or pH>12.5	7.40	7.13	6.97	8.34
GENERAL CHEM	CYANIDE, TOTAL MG/KG	-- ¹	0.69 U	0.62 U	0.58 U	0.46 J
GENERAL CHEM	FLASHPOINT DEGREES F	< 140 °F	>180	>180	>180	>180
GENERAL CHEM	FREE LIQUID	--	POS	NEG	NEG	POS
GENERAL CHEM	SULFIDE MG/KG	-- ¹	95	38 U	33 U	1,800
METALS (TCLP)	ARSENIC-TCLP MG/L	5	0.013 J	0.012 J	0.021 J	0.13 J
METALS (TCLP)	BARIUM-TCLP MG/L	100	1.4 J B	1.8 J B	0.18 J B	1.4 J
METALS (TCLP)	CADMIUM-TCLP MG/L	1	0.10 U	0.10 U	0.10 U	0.10 U
METALS (TCLP)	CHROMIUM-TCLP MG/L	5	0.0028 J	0.0066 J	0.0036 J	0.50 U
METALS (TCLP)	LEAD-TCLP MG/L	5	0.016 J B	0.038 J B	0.016 J B	0.0073 J B
METALS (TCLP)	MERCURY-TCLP MG/L	0.2	0.0020 U	0.0020 U	0.0020 U	0.0020 U
METALS (TCLP)	SELENIUM-TCLP MG/L	1	0.25 U	0.25 U	0.25 U	0.25 U
METALS (TCLP)	SILVER-TCLP MG/L	5	0.50 U	0.50 U	0.0040 J	0.50 U
SEMI-VOLATILE (TCLP)	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	2-METHYLPHENOL-TCLP MG/L	200 ²	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	3 & 4 METHYLPHENOL-TCLP MG/L	200 ²	0.040 U	0.040 U	0.0027 J	0.040 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	HEXACHLOROETHANE-TCLP MG/L	3	0.020 U	0.020 U	0.020 U	0.020 U
SEMI-VOLATILE (TCLP)	NITROBENZENE-TCLP MG/L	2	0.0040 U	0.0040 U	0.0040 U	0.0040 U
SEMI-VOLATILE (TCLP)	PENTACHLOROPHENOL-TCLP MG/L	100	0.040 U	0.040 U	0.040 U	0.040 U
SEMI-VOLATILE (TCLP)	PYRIDINE-TCLP MG/L	5	0.020 U	0.020 U	0.020 U	0.020 U
VOLATILES (TCLP)	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	2-BUTANONE (MEK)-TCLP MG/L	200	0.25 U	0.25 U	0.25 U	0.25 U
VOLATILES (TCLP)	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U

Bold = Detected concentration

U = Result was nondetect at reported limit

J = Positive concentration detected below the laboratory reporting limit, but above the method detection limit. Concentration is an estimated value.

B = Analyte was also detected in the associated laboratory method blank.

¹ A waste is considered hazardous if it is a cyanide- or sulfide-bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors sufficient to present a danger to human health or the environment. EPA interim guidance in July 1985 described threshold levels for cyanide- and sulfide-bearing wastes and analytical methods for evaluating such wastes, but withdrew the July 1985 guidance in April 1998. The EPA no longer recommends use of the interim threshold levels or methods to determine whether a waste is hazardous based on the characteristic of reactivity and intends to remove the guidance threshold levels and laboratory methods from Chapter Seven of SW-846.

² If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.